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April 9, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: MB Docket No. 03-185

Dear Ms. Dortch:

On April 1, 2004 members of the 700 MHz Advancement Coalition (the "Coalition") met with John Muleta, Sheryl Wilkerson, Llyod Coward and Shelly Blakeney and addressed matters set forth in the enclosed materials. Representing the Coalition were Charles Townsend, Jennifer McCarthy, Dean Brenner, Wirt Yerger and Cary Mitchell.

Pursuant to 47 C.F.R. § 1.1206(b)(2), and original one copy of this letter are being provided to you for inclusion in the public record in the above-referenced proceeding.

Sincerely,

/s/

Thomas Gutierrez

Attachments

cc. John Muleta
Sheryl Wilkerson
Lloyd Coward
Shelly Blakeney

700 MHz Advancement Coalition

Post Office Box 18283 ■ Washington DC 20006 ■ Tel: 202.263.0019 ■ Fax 202.263.0010

The “700 MHz Advancement Coalition” is a newly-formed group of 700 MHz license holders, together with interested technology and equipment providers, who are preparing to deliver new advanced wireless services using this spectrum in the near-term.

The Coalition would like to applaud the FCC for its far-sighted vision for the 700 MHz band, which we believe will serve as an excellent foundation for the rapid deployment of new technologies, products, and services.

One of the primary issues impacting the deployment of innovative advanced wireless services in the 700 MHz band is the availability and usability of these frequencies, which are currently occupied by both analog and digital television stations as part of the DTV transition.

The Coalition is eager to work with the FCC, other U.S. Government agencies, as well as with interested industry partners to find creative and acceptable solutions to the challenges posed by the DTV transition, including how to share effectively the 700 MHz band with incumbent broadcast stations during the transition and how to facilitate the DTV transition so that these frequencies can be cleared in a timely manner.

Some of the specific suggestions that the Coalition would like to make to the FCC include:

- 1) Develop new approaches to facilitate the DTV transition, including:
 - a. Working with Congress to establish a hard transition date,
 - b. Studying the Berlin, Germany DTV transition policies, such as the subsidization of DTV de-coders for low income families, that might be applicable to the U.S. market,
 - c. Investigating the costs of delaying the DTV transition past 12/31/06, the costs of administering the 85% rule to determine DTV penetration rates, as well as the economic benefits of promoting early adoption of DTV by the public,
 - d. Encouraging alternative band clearing arrangements, such as permitting flash-conversion to DTV for financially-challenged and out-of-core stations, etc.
- 2) Take a flexible approach in implementing the interference protection rules for the 700 MHz band so that new licensees can begin offering advanced wireless services on a commercial basis as soon as possible;
- 3) Ensure that no new or additional services, such as LPTV or unlicensed devices, are authorized to operate in the 700 MHz band, which would increase the likelihood of interference in this band.

The 700 MHz Advancement Coalition looks forward to working with the FCC to facilitate the rapid and effective delivery of new advanced wireless services in the 700 MHz band.

700 MHz Advancement Coalition

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Coalition Members

3G Comm, LLC
Acumen Technologies
Airspan Networks
Allcom Communications
Aloha Partners
Bruce Telephone Company
Cavalier Group
Chequamegon Communications Cooperative
Chibardun Telephone Cooperative
Citizens Telephone Cooperative
City of Ketchikan
Dba Ketchikan Public Utilities
Corr Wireless Communications
Craw-Kan Telephone Coop.
D&E Communications
DataCom Wireless
Dickey Rural Services
Dycom Holding
First Keystone Telecoms Group
FTC Inc.
Glenwood Telephone Membership Corp (GTMC)
Great Lakes of Iowa (CellularOne)
Great Plains Communications
GTC Wireless
Guadalupe Valley Communications Systems
GVNW Consulting
H&B Communications
Harbor Wireless
Kennebec Telephone Co.
Lexcom Telephone
Lima Directional Paging Inc.
LIN Television Corp

Mark Twain Communications Co.
McDonald County Telephone Company
McElroy Electronics Corp.
Mid-Rivers Communications
Milkyway Broadband
Mobius Communications
Monte Lee & Co
MTC North
Nemont Communications
NTCA
Panhandle Telecommunication Systems
Peoples Wireless
Pioneer Communications
PVT Networks
Red River Rural Tel. Assn.
QUALCOMM Incorporated
Rainbow Telephone Cooperative Assn.
Redwood County Telephone
Ronan Telephone Co
South Missouri 700 Consortium
Swayzee Telephone
TCA, Inc.
Triangle Communication System
Tri-County Telephone Association
Union Telephone
United Telecom
Vermont Telephone Company
Vulcan Capital
Webster-Calhoun Coop. Tel. Assn.
West Wisconsin Telecom Cooperative
Westelcom
Whidbey Telephone Co.

Meeting Objective

Requesting that the Commission expeditiously review Aloha's request for short spacing between TV/DTV stations and adjacent channel land mobile systems.

Significance

If the Commission approves this approach:

- 90% of Public Safety will be able to receive 700 MHz Broadband
- 80% of Rural America will be able to receive 700 MHz Broadband
- 60% of small businesses will be able to receive 700 MHz Broadband
- 40% of Top 100 markets will be able to receive 700 MHz Broadband

700 MHz Benefits

(Versus 1900 & 2500)

- Low cost (25% – 50% cheaper / pop)
- Great coverage (2 X 1900 MHz; 4 x 2500 MHz)
- No line of site issues (multi path)
- Less effected by foliage (leaves)
- Very good in building penetration (2 walls)

Aloha's Proposal Supports Commission Objectives To:

1. Increase Broadband Competition in Rural Markets
2. Increase Broadband Competition for Small Businesses
3. Provide Mobile Broadband for Public Safety
4. Accelerate the DTV Transition
5. Better Utilize Existing Spectrum

700 MHz Broadband Applications

1. Underserved Rural America (45 million pops)
2. Underserved Small Businesses (16 million employees)
3. Unserved Public Safety Groups (4 million employees)

700 MHZ

65% of Perceived Interference is due to Adjacent Channels

“C Block” (ch 54 & 59)

	<u># Stations</u>	<u>Percent</u>
Co Channel	59	(35%)
Adjacent Channel	<u>110</u>	<u>(65%)</u>
Total	169	(100%)

Public Safety

- 90% of U.S. Pops Could Be Clear:
 - Use channels 64 & 69 (12MHz)
 - Eliminate adjacent channel interference

Aloha's Request

- Will demonstrate that it meets the Commission's adjacent channel interference requirements for short spacing through the use of guardbands and low power.
- Could permit 700 MHz commercial service to 80% of rural America.
- Could permit 700 MHz Public Safety service to 90% of U.S.

Anticipated Next Steps

- Aloha will finalize engineering analysis (mid April)
- Aloha will submit short spacing request (late April)
- Aloha receives approval for short spacing (August)
- Aloha begins construction (September)
- Aloha begins wireless broadband service (1st Qtr 2005)